

ESTTA Tracking number: **ESTTA639279**

Filing date: **11/17/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Proceeding | 91218753 |
| Party | Defendant Switz Licensing SA |
| Correspondence Address | KATHRYN STARSHAK K&L GATES LLP PO BOX 1135 CHICAGO, IL 60690-1135 chicago.trademarks@klgates.com;kate.sta |
| Submission | Answer |
| Filer's Name | Whitney J. Stowe |
| Filer's e-mail | TTABlitigation@klgates.com, chicago.trademarks@klgates.com, kate.starshak@klgates.com |
| Signature | /wjstowe/ |
| Date | 11/17/2014 |
| Attachments | Answer_to_SWISSONE_Opp_No_91217853.pdf(40256 bytes) |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application Serial No. 86/125,793

For the mark **SWISSONE**

Published in the *Official Gazette* on June 10, 2014

| | | |
|------------------------|---|-------------------------|
| SWISS ARMY BRAND LTD., |) | |
| WENGER S.A., |) | |
| VICTORINOX AG |) | |
| |) | |
| Opposers, |) | Opposition No. 91218753 |
| |) | |
| v. |) | |
| |) | |
| SWITZ LICENSING SA, |) | |
| |) | |
| Applicant. |) | |
| |) | |

**APPLICANT’S ANSWER AND AFFIRMATIVE DEFENSES
TO NOTICE OF OPPOSITION**

Applicant SWITZ Licensing SA (“SWITZ Licensing”), by and through its counsel K&L Gates LLP, responds as follows to the Notice of Opposition filed by Swiss Army Brand Ltd., Wenger S.A., and Victorinox AG (“Opposers”) in Proceeding No. 91218753. All allegations not specifically admitted are denied. SWITZ Licensing denies that Opposers will be damaged by registration of U.S. Trademark Application Serial No. 86/125,793.

1. Victorinox is the common parent corporation of Victorinox Swiss Army, Inc., (“VSAI”), a Delaware corporation, and Wenger S.A. (“Wenger”), a Switzerland corporation. Victorinox is organized and exists under the laws of Switzerland.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

2. Swiss Army Brand is a subsidiary of VSAI.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

3. VSAI and its related companies and licensees manufacture and sell various products bearing the trademark SWISS ARMY. VSAI, itself and through its subsidiaries, licensees, and related companies, has used the SWISS ARMY mark in interstate commerce continuously since at least as early as 1958.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

4. Swiss Army Brand began using the trademark SWISS ARMY in commerce in connection with colognes in November 1996, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

5. Prior to Applicant's filing of its application, Swiss Army Brand obtained U.S. Trademark Registration No. 2,948,137 for SWISS ARMY for use in connection with, *inter alia*, "[Perfumes,] colognes, skin lotions, deodorant, after shave lotion" in International Class 3. This registration is incontestable.

ANSWER: SWITZ Licensing admits that USPTO records indicate that U.S. Trademark Registration No. 2,948,137 lists SWISS ARMY for use in connection with *inter alia*, "[Perfumes,] colognes, skin lotions, deodorant, after shave lotion" in International Class 3. Whether or not Registration No. 2,948,137 is incontestable is a legal conclusion and SWITZ Licensing is not required to respond. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

6. Swiss Army Brand began using the trademark SWISSLITE in commerce in connection with pocket knife tools in October 1996, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

7. Prior to Applicant's filing of its application, Swiss Army Brand obtained U.S. Trademark Registration No. 2,348,903 for SWISSLITE (Stylized) for use in connection with "multiple function hand operated pocket knife tools" in International Class 8. This registration is incontestable.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 2,348,903 lists SWISSLITE (Stylized) for use in connection with "multiple function hand operated pocket knife tools" in International Class 8. Whether or not Registration No. 2,348,903 is incontestable is a legal conclusion and SWITZ Licensing is not required to respond. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

8. Swiss Army Brand began using the trademark SWISSCARD in commerce in connection with "multiple function pocket size instruments" in January 1997, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

9. Prior to Applicant's filing of its application, Swiss Army Brand obtained U.S. Trademark Registration No. 2,362,526 for SWISSCARD (Stylized) for use in connection with "multiple function pocket size instruments consisting of various implements, namely, nail file with screwdriver tip, toothpick, straight pin, tweezer, pen, ruler, knife blade and scissors" in International Class 8. This registration is incontestable.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 2,362,526 lists SWISSCARD (Stylized) for use in connection with “multiple function pocket size instruments consisting of various implements, namely, nail file with screwdriver tip, toothpick, straight pin, tweezer, pen, ruler, knife blade and scissors” in International Class 8. Whether or not Registration No. 2,362,526 is incontestable is a legal conclusion and SWITZ Licensing is not required to respond. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

10. Victorinox began using the trademark SWISS ARMY in commerce in connection with pocketknives in 1958, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

11. Prior to Applicant’s filing of its application, Victorinox obtained U.S. Trademark Registration No. 2,806,013 for SWISS ARMY for use in connection with “handtools, namely multifunction pocketknives” in International Class 8. This registration is incontestable.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 2,806,013 lists SWISS ARMY for use in connection with “handtools, namely multifunction pocketknives” in International Class 8. Whether or not Registration No. 2,806,013 is incontestable is a legal conclusion and SWITZ Licensing is not required to respond. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

12. Swiss Army Brand began using the trademark SWISS ARMY in commerce in connection with sunglasses in February 1989, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

13. Prior to Applicant's filing of its application, Swiss Army Brand obtained U.S. Trademark Registration No. 1,715,093 for SWISS ARMY for use in connection with "sunglasses" in International Class 9.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 1,715,093 lists SWISS ARMY for use in connection with "sunglasses" in International Class 9. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

14. Wenger began using the trademark SWISSGEAR in commerce in connection with computer and camera cases and electronic travel accessories in July 2004, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

15. Prior to Applicant's filing of its application, Wenger obtained U.S. Trademark Registration No. 3,769,824 for SWISSGEAR for use in connection with, *inter alia*, "Computer carrying cases, camera cases, electronic travel accessories, namely, adapters, converters, transformers and battery chargers for electronic devices" in International Class 9.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 3,769,824 lists SWISSGEAR for use in connection with, *inter alia*, "Computer carrying cases, camera cases, electronic travel accessories, namely, adapters, converters, transformers and battery chargers for electronic devices" in International Class 9. SWITZ

Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

16. Swiss Army Brand began using the trademark SWISS ARMY in commerce in connection with watches in June 1987, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

17. Prior to Applicant's filing of its application, Swiss Army Brand obtained U.S. Trademark Registration No. 1,734,665 for SWISS ARMY (Stylized) for use in connection with "watches" in International Class 9.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 1,734,665 lists SWISS ARMY (Stylized) or use in connection with "watches". SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

18. Wenger began using the trademark SWISSGEAR in commerce in connection with bags and luggage in October 2003, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

19. Prior to Applicant's filing of its application, Wenger obtained U.S. Trademark Registration No. 3,769,824 for SWISSGEAR for use in connection with, *inter alia*, "All-purpose dry carrying bags, luggage, backpacks, daypacks, duffel bags; utility bags, namely, carry-all bags; shoulder bags; casual carry-all bags, and casual tote bags; briefcases; non-motorized wheeled packs, namely, back packs and sport packs; travel bags, small personal leather goods, namely, wallets, and shaving bags sold empty, umbrellas and name and calling card cases, cosmetic cases sold empty, toiletry cases sold empty, luggage tags, waistpacks; bags worn on the body, namely, fanny packs; business cases, all-purpose personal care toiletry bags sold empty, small personal leather goods, namely, billfolds, credit card cases, neck and necklace wallets" in International Class 18.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 3,769,824 lists SWISSGEAR for use in connection with, *inter alia*, “All-purpose dry carrying bags, luggage, backpacks, daypacks, duffel bags; utility bags, namely, carry-all bags; shoulder bags; casual carry-all bags, and casual tote bags; briefcases; non-motorized wheeled packs, namely, back packs and sport packs; travel bags, small personal leather goods, namely, wallets, and shaving bags sold empty, umbrellas and name and calling card cases, cosmetic cases sold empty, toiletry cases sold empty, luggage tags, waistpacks; bags worn on the body, namely, fanny packs; business cases, all-purpose personal care toiletry bags sold empty, small personal leather goods, namely, billfolds, credit card cases, neck and necklace wallets” in International Class 18. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

20. Wenger began using the trademark SWISSGEAR in commerce in connection with clothing and footwear in September 2011, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

21. Prior to Applicant’s filing of its application, Wenger obtained U.S. Trademark Registration No. 4,230,244 for SWISSGEAR for use in connection with “Clothing, namely, footwear, shoes, boots, hats, socks, hosiery, headwear” in International Class 25.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 4,230,244 lists SWISSGEAR for use in connection with “Clothing, namely, footwear, shoes, boots, hats, socks, hosiery, headwear” in International Class 25. SWITZ

Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

22. Swiss Army Brand began using the trademark SWISS ARMY in commerce in connection with clothing in December 2004, and has acquired valuable common law rights in the mark.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

23. Prior to Applicant's filing of its application, Swiss Army Brand obtained U.S. Trademark Registration No. 3,561,647 for SWISS ARMY for use in connection with "men's and women's clothing, namely, jackets, hats, sweaters, shirts, t-shirts, polo shirts, dress shirts, scarves, pants, shorts, coats, parkas, wind resistant jackets, rainwear, gloves, headwear" in International Class 25. This registration is incontestable.

ANSWER: SWITZ Licensing admits that USPTO records indicate that Trademark Registration No. 3,561,647 lists SWISS ARMY for use in connection with "men's and women's clothing, namely, jackets, hats, sweaters, shirts, t-shirts, polo shirts, dress shirts, scarves, pants, shorts, coats, parkas, wind resistant jackets, rainwear, gloves, headwear" in International Class 25. Whether or not Registration No. 3,561,647 is incontestable is a legal conclusion and SWITZ Licensing is not required to respond. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

24. With respect to paragraphs 4 through 23, copies of the relevant registrations (collectively, "Opposers' Registrations") and United States Patent and Trademark Office database print-outs reflecting the current status and title of such registrations are attached as Exhibits A through I.

ANSWER: SWITZ Licensing admits that United States Patent and Trademark Office database print-outs appear to be attached to Opposers' Notice of Opposition. SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph, and on that basis denies the allegations.

25. Opposers' Registrations are valid and subsisting, unrevoked and uncanceled, and are *prima facie* evidence of the validity of Opposers' exclusive rights to use the marks in commerce in connection with the goods described in the registrations, and constitute constructive notice of Opposers' ownership of the marks for the goods described in the registrations, as provided by Sections 7(b), 15, and 22 of the Lanham Act, 15 U.S.C. §§ 1057(b), 1065, 1072.

ANSWER: The allegations contained in this paragraph consist of legal conclusions and therefore do not require a response. To the extent a response is required, this paragraph is denied.

26. Opposers' Registrations constitute a family of trademarks beginning with the term SWISS and followed by a single distinguishing noun, such that they are recognized as identifying Opposers for the goods on which they are used and for which they are registered.

ANSWER: The allegations contained in this paragraph consist of legal conclusions and therefore do not require a response. To the extent a response is required, this paragraph is denied.

27. Opposers have expended substantial time, effort and financial resources in advertising and promoting their goods under the SWISS ARMY, SWISSGEAR, SWISSLITE, and SWISSCARD marks. As a result of such advertising and promotional activities, these marks have become well-known, the relevant public has come to associate and identify these marks with Opposers, and Opposers derive substantial goodwill from such identification by consumers.

ANSWER: SWITZ Licensing lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph, and on that basis denies the allegations.

28. Upon information and belief, Applicant is a corporation organized and existing under the laws of Switzerland, having an address at 3 Rue de l'Avenir, Delemont 2800, Switzerland.

ANSWER: Admitted.

29. On November 21, 2014, Applicant filed Trademark Application Serial Number 86/125,793 for the mark SWISSONE under Section 44(e) of the Lanham Act, covering the following goods:

International Class 3: Perfumery; all these products originating from Switzerland

International Class 8: Hand tools and hand-operated implements, namely, cutlery; all these products originating from Switzerland

International Class 9: Sunglasses; these products being reserved for sport; these products being moreover excluded from any use in the field of security and of the protection of the persons; all these products originating from Switzerland

International Class 14: Precious metals and their alloys and goods in precious metals or coated therewith, namely, jewelry and watches; all these products originating from Switzerland

International Class 18: Trunks and traveling bags, backpacks, wallets, umbrellas, walking sticks; all these products originating from Switzerland

International Class 20: Furniture, namely, camping furniture, airbeds; all these products originating from Switzerland

International Class 21: Camping utensils, namely, spatulas, turners and tongs; portable camping containers for food; all the aforesaid products of Swiss origin

International Class 22: Tents; awnings; tarpaulins; sails; sacks and bags made of canvas or cloth for storage; raw fibrous textile materials; all the aforesaid products of Swiss origin

International Class 25: Clothing, namely, gloves, jackets, sweaters, t-shirts, shirts, trousers, shorts, socks, belts, rain wear and ponchos; sports shoes; hats; caps; cowls; scarfs; and headbands; all these products being reserved for sport; these products being moreover excluded from any use in the field of security and of the protection of the persons; all these products originating from Switzerland

ANSWER: SWITZ Licensing admits that the contents of its Trademark Application

Serial No. 86/125,793 are accurately depicted in this paragraph.

30. Opposers hereby oppose registration of Applicant's Mark for those goods specified by Applicant in International Classes 3, 8, 9, 14, 18 and 25 ("Applicant's Goods").

ANSWER: This paragraph does not require a response. SWITZ Licensing denies that

Opposers will be damaged by Applicant's Mark.

Opposers' "Count I: Likelihood of Confusion"

31. Opposer hereby incorporates by reference the allegations in Paragraphs 1 through 30 hereof as if fully set forth herein.

ANSWER: This paragraph does not require a response.

32. Opposers' rights in the SWISS ARMY, SWISSGEAR, SWISSLITE, and SWISSCARD marks are prior to and superior to any rights that Applicant may claim in SWISSONE, in any form or style.

ANSWER: Denied.

33. Applicant's SWISSONE mark incorporates the dominant component of Opposers' SWISS ARMY, SWISSGEAR, SWISSLITE, and SWISSCARD marks, and thus is similar in sight, sound, meaning, structure, and overall commercial impression such that it would be taken as one of Opposers' family of marks, and unavoidably suggests an association with Opposers.

ANSWER: Denied.

34. Applicant intends to use the SWISSONE mark on categories of goods that are identical to and coextensive with those on which Opposers use their SWISS ARMY, SWISSGEAR, SWISSLITE, and SWISSCARD marks.

ANSWER: Denied.

35. Use and registration of Applicant's SWISSONE mark in connection with the specified goods is likely to cause consumer confusion, mistake, or to deceive the public into believing that Applicant's Goods are somehow affiliated or associated with, connected to or sponsored by Opposers, in violation of Section 2(d) of the Lanham Act, 15 U.S.C. § 1052(d).

ANSWER: Denied.

36. Opposers will be damaged by the registration of Applicant's Mark by reason of the foregoing, and because such registration will support and assist Applicant in causing confusion and in misleading consumers by providing a color of exclusive statutory rights in Applicant in violation and in derogation of Opposers' prior and superior rights in their SWISS ARMY, SWISSGEAR, SWISSLITE, and SWISSCARD marks.

ANSWER: Denied.

Opposers' "Count II: Mere Descriptiveness"

37. Opposers hereby incorporate by reference the allegations in Paragraphs 1 through 36 hereof as if fully set forth herein.

ANSWER: This paragraph does not require a response.

38. The initial syllable, the term SWISS, merely describes a quality, characteristic, function, or feature of Applicant's Goods.

ANSWER: Denied.

39. The remaining component syllable of Applicant's Mark, ONE, does not change the nature of the mark. The term ONE in this instance is also descriptive and refers to a single unit of something Swiss, otherwise undefined. Thus, the term SWISSONE merely describes either a geographic region or an entity, thing, or person from such region of which there are legion, and therefore fails to distinguish the goods of Applicant from the goods of others as required by Section 2 of the Lanham Act, 15 U.S.C. § 1052.

ANSWER: Denied.

40. The SWISSONE Application should be refused registration on the ground that the mark is non-distinctive and merely descriptive under Section 2(e)(1) of the Lanham Act, 15 U.S.C. § 1052(e)(1).

ANSWER: Denied.

Opposers' "Count III: Primarily Geographically Descriptive"

41. Opposers hereby incorporate by reference the allegations of Paragraphs 1 through 40 hereof as if fully set forth herein.

ANSWER: This paragraph does not require a response.

42. Applicant's Mark must be viewed as primarily geographically descriptive of the goods of Applicant. It consists of the term SWISS, an adjective or noun of indisputable geographic connotation, and the term ONE, a numeral or an indefinite pronoun-like word, in this instance without defining antecedent. The term ONE itself contributes nothing to the source-identifying capacity of the mark. Thus, the resulting mark, SWISSONE, must be viewed as primarily geographically descriptive with respect not only to Applicant's Goods, but to any goods that originate from Switzerland.

ANSWER: Denied.

43. The adjectival form of the name of a geographic location is considered primarily geographic if it is likely to be perceived as such by the purchasing public.

ANSWER: This paragraph contains a legal conclusion and therefore does not require a response. To the extent a response is required as to SWITZ Licensing's goods, this paragraph is denied.

44. Upon information and belief, Applicant is a company located in Switzerland.

ANSWER: Admitted.

45. Upon information and belief, and according to Applicant's identifications of goods, Applicant's Goods "originat[e] from Switzerland."

ANSWER: Admitted.

46. Upon information and belief, the consuming public will likely believe that Applicant's Goods originate in the geographic place identified by the SWISSONE mark, a belief reinforced by the fact that Applicant is domiciled in Switzerland.

ANSWER: This paragraph contains a legal conclusion and therefore does not require a response. To the extent a response is required as to SWITZ Licensing's goods, this paragraph is denied.

47. Applicant's Mark SWISSONE, when used on or in connection with Applicant's Goods, is geographically descriptive as defined in Section 2 of the Federal Trademark Act, 15 U.S.C. §1052(e)(2) and should properly be refused registration.

ANSWER: Denied.

AFFIRMATIVE DEFENSES

1. The Notice of Opposition fails to state a claim upon which relief can be granted.
2. There is no likelihood of confusion between SWITZ Licensing's mark as reflected in U.S. Trademark Application Serial No. 86/125,793 and Opposers' marks.
3. Opposers' claims are barred due to the crowded nature of the field of SWISS marks.
4. SWITZ Licensing may assert other affirmative defenses or counterclaims that may be developed throughout discovery and testimony periods in this proceeding.

Respectfully submitted,

Dated: November 17, 2014

K&L GATES LLP

By: /Kathryn Starshak/
Kathryn Starshak
70 W. Madison Street
Suite 3100

Chicago, IL 60602
Phone: 312.781.6013
Fax: 312.827.8136
kate.starshak@klgates.com

Whitney J. Stowe
618 W. Riverside Avenue
Suite 300
Spokane, WA 99201
Phone: 509.624.2100
Fax: 509.456.0146
whitney.stowe@klgates.com

Attorneys for Applicant
SWITZ Licensing S.A.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she caused a true and correct copy of **Applicant's Answer and Affirmative Defenses to Notice of Opposition** to be served upon the following attorneys for Opposers:

David Weild III
Danielle E. Gorman
Edwards Wildman Palmer LLP
F.D.R. Station; P.O. Box 130
New York, NY 10150
trademark@edwardswildman.com,
dweild@edwardswildman.com,
degorman@edwardswildman.com

by email and first class mail, proper postage prepaid, this 17th day of November, 2014.

/Cari M. Hollabaugh/
Cari M. Hollabaugh, Paralegal